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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CASE NO. 18-14700-elf
GEORGE GETSOS, :
Debtor : Chapter 13
KNOLLS OF BIRMINGHAM SINGLES :
ASSOCIATION, :
Movant :
vs. :
GEORGE GETSOS, :
Respondent :

**OBJECTION OF KNOLLS OF BIRMINGHAM SINGLES ASSOCIATION TO
CONFIRMATION OF THE DEBTOR'S CHAPTER 13 PLAN**

Movant, Knolls of Birmingham Singles Association, (hereinafter “Movant”), by its attorneys, Marcus & Hoffman, P.C., hereby objects to confirmation of the Debtor’s Chapter 13 Plan as follows:

1. Movant is Knolls of Birmingham Singles Association.
2. Debtor, George Getsos, is the owner of the property located at 1341 Wooded Knolls, West Chester, PA 19382, located within the Knolls of Birmingham Singles Association.
3. On July 24, 2018, Movant filed a Proof of Claim listing pre-petition arrears in the amount of \$7,177.41. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.

4. Debtor's Chapter 13 Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).

5. Debtor's Chapter 13 Plan does not provide for payment of arrears to Movant, who is a secured creditor. A copy of the Debtor's Chapter 13 Plan is attached hereto as Exhibit "B" and made a part hereof.

6. Movant objects to Debtor's Plan, as it does not provide for payment of arrears to Movant. Debtor's Plan should be amended to fully fund the arrears owed to Movant in the amount as stated in Movant's Proof of Claim. Confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, Knolls of Birmingham Singles Homeowners Association respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Dated: October 3, 2018

Respectfully Submitted:

/s/ Michelle J. Stranen, Esquire
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